

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
5:19-cv-00467-BO

JUSTIN J. WHITE,

Plaintiff,

v.

VANCE COUNTY, NORTH CAROLINA,  
VANCE COUNTY SHERIFF'S OFFICE,  
PETER WHITE, in his official and individual  
capacities, LAWRENCE D. BULLOCK, in  
his official and individual capacities,  
WELDON WALLACE BULLOCK, in his  
official and individual capacities.

Defendants.

AFFIDAVIT OF  
SHERIFF CURTIS BRAME

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NOW COMES the affiant, Curtis Brame, and, after having been previously sworn, states as follows:

1. I am over 18 years of age, do not suffer from any disability, am competent to make this affidavit, and have personal knowledge of the facts contained in this affidavit.
2. I am the Sheriff of Vance County. I retired from the Vance County Sheriff's Office in November 2016 after 33½ years of service with the agency and 35 total years in law enforcement. I ran for sheriff in 2018 and was elected that November, and I took office in December 2018.
3. I do not know the plaintiff, and I have never met him or spoken with him. I know of him only from this lawsuit. The plaintiff was hired as a Vance County sheriff's deputy by my predecessor in 2017 and fired in 2018. The plaintiff and I never served at the Vance County Sheriff's Office at the same time.

Ex. B

4. I do not recall speaking with anyone who was seeking a job reference for the plaintiff. If I had done so, I would not have said anything negative about the plaintiff because I do not know him. I am unaware of anyone in the Vance County Sheriff's Office who gave a negative job reference about the plaintiff during my tenure in office. If anyone did so, it would have been without my approval and not at my direction.

5. I have no knowledge of any prospective employment opportunities the plaintiff has had. I am aware, as a result of this lawsuit, that the plaintiff was fired for using excessive force on a black woman and that an internal investigation of the incident was conducted. This occurred before I took office and I had no involvement in it. My predecessor was required by law to report the plaintiff's termination to the North Carolina Sheriffs' Standards Division and to state whether an internal investigation was conducted.

6. I did not know that the plaintiff was planning to file this lawsuit until after he had filed it.

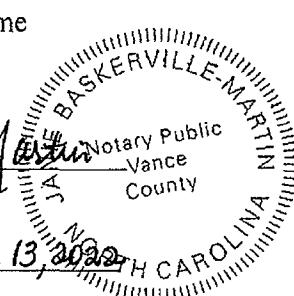
7. Like the plaintiff, I am African-American. I have not had any dealings with the plaintiff and have done nothing that had any effect on him, but it is offensive and false to suggest that I would have done anything on the basis of his race.

This is the 27<sup>th</sup> day of August, 2020.

Curtis R Brame  
CURTIS BRAME

Sworn to and subscribed before me  
this 27<sup>th</sup> day of August, 2020.

Jeanie Baskerville-Martin  
NOTARY PUBLIC  
My Commission Expires: March 13, 2020



The seal is circular with the text "JEANIE BASKERVILLE-MARTIN" around the top edge. In the center, it says "Notary Public", "Vance County", and "NORTH CAROLINA". At the bottom, it says "Commission Expires" followed by the date "March 13, 2020".